

ADMINISTRATIVE RECORD FILE INDEX

REMOVAL ACTION

SITE NAME: HILLSDALE DRUMS, REMOVAL II

SITE NUMBER: LAD985241766

INDEX DATE: JULY 27, 1993

150796





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

FACT SHEET

Administrative Records in Local Repositories

The "administrative record" is the collection of documents which form the basis for the selection of a response action at a removal site. Under section 113(k) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended by the Superfund Amendments and Reauthorization Act (SARA), EPA is required to establish an administrative record for every CERCLA response action and to make a copy of the administrative record file available at or near the site.

The administrative record file will be available for public review during normal business hours. The record file is treated as a non-circulating reference document. Individuals may photocopy any documents contained in the record file, according to the photocopying procedures at the local repository.

The administrative record file will be maintained at the local repository until further notice. Documents may be added to the record file as the site work progresses. EPA may send supplemental volumes and indexes to the local repository to be placed with the initial record file.

The Agency may hold formal public comment periods at certain stages of the response process. The public is urged to use these formal review periods to submit their written comments. EPA welcomes written comments at any time on documents contained in the administrative record file. Please send any such comments to:

U.S. EPA
Removal Administrative Record Coordinator
Emergency Response Branch (6E-E)
1445 Ross Avenue
Dallas, TX 75202



The Superfund Removal Program

Incidents involving hazardous substances that present an imminent threat to human health or the environment may occur or be discovered in any community at any time. These kinds of incidents may include, but are not limited to:

- Illegal disposal of toxic materials or hazardous waste,
- Improper handling or disposal of hazardous substances at landfills, industrial areas, etc.
- Spills of hazardous substances when a truck or train overturns,
- Discharges of hazardous substances into the air or water during a fire.

The U.S. Environmental Protection Agency (EPA) Superfund Emergency Response Program was created to respond to situations such as these.

How Can EPA Respond to Releases or Threatened Releases of Hazardous Substances?

Under Superfund, EPA may respond to releases or threats of releases of hazardous substances by starting a removal action. A removal action is a short-term action intended

Congress enacted the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as Superfund, in 1980. This law created a tax on the chemical and petroleum industries and provided a broad Federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or welfare or the environment. Over 5 years, \$1.6 billion were collected and the tax went to a Trust Fund for cleaning up abandoned or uncontrolled hazardous waste sites. The U.S. Environmental Protection Agency (EPA) is responsible for running the Superfund program. On October 17,

1986, the Superfund Amendments and Reauthorization Act (SARA) was signed into law. SARA increases the Trust Fund to \$8.5 billion over 5 years and strengthens EPA's authority to conduct cleanup and enforcement activities.

Under the Superfund program, EPA can:

- Pay for the cleanup of hazardous waste sites when those responsible for such sites cannot be found or are unwilling or unable to clean up a site.
- Take legal action to force those responsible for hazardous waste sites that threaten public health or the environment to clean up those sites or pay back the Federal

government for the costs of cleanup.

The law authorizes two kinds of response actions:

- Short-term removals where actions may be taken to address releases or threats of releases requiring prompt response.
- Longer-term remedial responses that permanently and significantly reduce the dangers associated with releases or threats of releases of hazardous substances that are serious but not immediately life threatening. They can be conducted only at sites on EPA's National Priorities List (NPL). Remedial and removal responses include, but are not limited to:

- Destroying, detoxifying or immobilizing the hazardous substances on the site through incineration or other treatment technologies.
- Containing the substances on-site so that they can safely remain there and present no further threat.
- Removing the materials from the site to an EPA-approved, licensed hazardous waste facility for treatment, containment, or destruction.
- Identifying and restoring contaminated ground water, halting further spread of the contaminants, or in some circumstances providing an alternate source of drinking water.

to stabilize or clean up an incident or site that poses a threat to human health or the environment. These actions may include:

- Removing and disposing of hazardous substances,
- Constructing a fence, posting warning signs, or taking other security measures to control access of humans or animals to a site,
- Providing alternate water supplies to local residents where drinking water has become contaminated,
- Temporarily relocating area residents.

Under Superfund, removal actions can last no longer than 12 months in duration or cost more than \$2 million, although exemptions may be granted in certain circumstances.

Because the purpose of removal actions is to respond to more immediate threats and because they are short-term actions, they generally cannot deal with long-term environmental problems like area-wide contamination of ground water. In that event, the On-Scene Coordinator refers the site to EPA's Remedial Response Program for further investigation and assessment.

Remedial actions are longer-term actions that stop or substantially reduce releases or threatened releases of hazardous substances that are serious but not immediately life-threatening. Remedial actions can be undertaken only at sites on EPA's National Priorities List (NPL), which identifies the most serious uncontrolled or abandoned hazardous waste sites. EPA often conducts both removal and remedial actions at NPL sites. Removal actions may be required if an immediate threat is discovered during remedial work. Removals also must contribute to the efficient performance of any long-term remedial action.

How Does the Removal Program Work?

The National Contingency Plan (NCP), the Federal regulation that guides the Superfund program, outlines the roles and responsibilities of each agency involved in responding to releases or threatened releases of hazardous substances. The U.S. Coast Guard has primary responsibility for response to releases in or upon the coastal and other navigable waters of the United States, and EPA has primary responsibility for inland response.

The first step in EPA's removal program is the discovery of a release or threatened release of hazardous substances that presents a threat to public health or the environment. EPA may be notified through the National Response Center (NRC) at the 24-hour telephone number 1-800-424-8802, which is operated by the U.S. Coast Guard, or be contacted directly by States, communities, industries or individuals.

The NRC notifies the appropriate government agencies and officials when a release is reported. EPA's On-Scene Coordinator evaluates the situation, and based upon this evaluation, may use Superfund money to clean up the incident if those responsible for the incident cannot or will not conduct the cleanup, or if State or local officials are unable to respond. Other government agencies may be called upon for assistance when necessary, depending upon the nature and extent of the release.

Who Pays For Removal Actions?

Some removals are paid for or conducted by those responsible for creating the emergency. In addition to past and present owners or operators, those responsible may include generators, transporters, storers, or disposers of hazardous substances. The rest may be paid for and conducted by State or county response teams with their own funds, or by EPA, using Superfund money. When Superfund money is used, EPA may take action to force those responsible to reimburse the Federal government for the costs of the cleanup.

COMMONLY USED ACRONYMS

ADPC&E	Arkansas Department of Pollution Control & Ecology
AO	Administrative Order
ATSDR	Agency for Toxic Substances and Disease Registry
CDC	Centers for Disease Control
CERCLA	Comprehensive Environmental Response Compensation & Liability Act of 1980
CFR	Code of Federal Regulations
EPA	United States Environmental Protection Agency
ERB	Emergency Response Branch
ERCS	Emergency Response & Cleanup Service
FOIA	Freedom of Information Act
LDEQ	Louisiana Department of Environmental Quality
NMEID	New Mexico Environmental Improvement Division
NPL	National Priorities List
OPA	Oil Pollution Act
OSC	On-Scene Coordinator
OSDH	Oklahoma State Department of Health
OSHA	Occupational Safety and Health Administration
POLREP	Pollution Report
PRP	Potentially Responsible Party
RCRA	Resource Conservation and Recovery Act of 1976
SARA	Superfund Amendments and Reauthorization Act of 1986
TAT	Technical Assistance Team
TWC	Texas Water Commission
TDWR	Texas Department of Water Resources

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SITE NAME: HILLSDALE DRUMS, REMOVAL II
SITE NUMBER: LAD985241766

RECORD NUMBER: 1
DOCUMENT DATE: Undated FIRST PAGE: 0001 LAST PAGE: 0001
DOCUMENT TYPE: Document List
DOCUMENT TITLE: Documents Consulted to Determine Need for
Hillsdale Drums, Removal I and Removal II
AUTHOR: Emergency Response Branch
COMPANY/AGENCY: EPA, Region 6
RECIPIENT: File
COMPANY/AGENCY: EPA, Region 6
DESCRIPTION: Identifies specific documents considered in
determining the need for a second removal
action which were also contained in the
Administrative Record File for Removal I.

RECORD NUMBER: 2
DOCUMENT DATE: 02/24/92 FIRST PAGE: 0002 LAST PAGE: 0008
DOCUMENT TYPE: POLREP #1, Hillsdale Drums I
DOCUMENT TITLE: Hillsdale Drum Site
AUTHOR: Mike Ryan, OSC
COMPANY/AGENCY: EPA, Region 6
RECIPIENT: File
COMPANY/AGENCY: EPA, Region 6
DESCRIPTION: Site is composed of three subsites, A, B, & C,
all having numerous drums of incompatible
material. Threat of fire and explosion.
Describes current response action being taken,
including sampling.

RECORD NUMBER: 3
DOCUMENT DATE: 03/13/92 FIRST PAGE: 0009 LAST PAGE: 0012
DOCUMENT TYPE: POLREP #2, Hillsdale Drums I
DOCUMENT TITLE: Hillsdale Drum Site
AUTHOR: Charles Fisher, OSC
COMPANY/AGENCY: EPA, Region 6
RECIPIENT: File
COMPANY/AGENCY: EPA, Region 6
DESCRIPTION: Materials from Sites A and C have been restaged
at Site B. Access to sites has been limited by
construction of fences. Second phase activities
of transportation and disposal scheduled to
begin 05/92.

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SITE NAME: HILLSDALE DRUMS, REMOVAL II
SITE NUMBER: LAD985241766

RECORD NUMBER: 4
DOCUMENT DATE: 06/24/92 FIRST PAGE: 0013 LAST PAGE: 0021
DOCUMENT TYPE: Action Memorandum
DOCUMENT TITLE: Request for a Removal Action at the Hillsdale
Drum Site, Hillsdale, LA
AUTHOR: Robert M. Ryan, OSC
COMPANY/AGENCY: EPA, Region 6
RECIPIENT: Russell F. Rhoades, Director, Environmental
Services Division
COMPANY/AGENCY: EPA, Region 6
DESCRIPTION: Requests and documents approval of a second
removal action at the Hillsdale Drum Site.
Proposed action includes transportation and
disposal of contaminated materials.

RECORD NUMBER: 5
DOCUMENT DATE: 06/24/92 FIRST PAGE: 0022 LAST PAGE: 0022
DOCUMENT TYPE: Enforcement Attachment/Confidential
DOCUMENT TITLE: Enforcement Attachment to the Action Memorandum
for the Hillsdale Drum Site
AUTHOR: Sam Becker, Chief, Superfund Enforcement Branch
COMPANY/AGENCY: EPA, Region 6
RECIPIENT: Charlie Gazda, Chief, Emergency Response Branch
COMPANY/AGENCY: EPA, Region 6
DESCRIPTION: Enforcement Attachment to the Action Memorandum
dated 06/24/92, is Confidential, and located in
a separate, Confidential File.